

Comments submitted to Matt Dias Board of Forestry Meeting Dec. 6, 2017

From: Susan Edinger Marshall, CRM Panel Chair,
Professor Rangeland Resources and Wildland Soils, Humboldt State University

Thank you for the opportunity to provide input to Item 12 (Petition for Administrative Rulemaking.)

1. CA Certified Rangeland Managers wish to be part of the discussion on proposed rule changes before decisions are made.
2. The proposal imposes new duties on a private, volunteer-run organization (California-Pacific Section Society for Range Management's Certification Panel), but does not provide resources to undertake additional responsibilities.

The proposal expands responsibilities, whereas Public Resources Code § 772 currently only mentions "review" of discipline, not active investigation.

My emphasis below:

"That certification as a specialist shall be granted provided **the board determines** the program fully protects the public interest in that area of practice encompassed by the program. Those certificants are subject to board registration and discipline with **review** by that specialty."

3. The proposal conflicts with PRC §778 and elements of the CA Administrative Code.
4. The proposal substantively changes responsibilities of Professional Foresters Examining Committee, *for example* Public Resources Code § 763(b)(3)
"(b) The examining committee shall do all of the following:

..... (3) Review complaints, which review may include independent investigations or expert witness evaluations, and make disciplinary recommendations to the board."

The PFEC is the body created by state law to investigate potential discipline and the regulation cannot divest it of that responsibility. Many of the proposal's changes are confusing, ill-defined, and generally alter PFEC responsibilities.